

National Aeronautics and Space Administration

Headquarters  
Washington, DC 20546-0001



December 4, 2012

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Aerospace Industries Association's (AIA) 48<sup>th</sup> Annual Year-End Luncheon on December 4, 2012

On December 4, 2012, the Aerospace Industries Association (AIA), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host its 48<sup>th</sup> Annual Year-End Luncheon. The event will take place at the Grand Hyatt Hotel, in Washington, D.C. at 11:30 AM. Approximately 300 people are expected to attend. The estimated cost of the event including all food and beverages is \$80.00 per person.

The event will be attended by academia, the legislative branch, representatives of the aerospace industry, academia, and the media. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will provide NASA attendees with the opportunity to exchange information regarding various NASA programs.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. However, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone